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DATE FILED: 11/12/14

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November 10, 2014

Honorable Kimba M. Wood United States District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312

> Re: Gulino, et al. v. Bd. of Educ, Civil Action No. 96 Cv. 8414 (KMW)

Law Dept. No. 96-GL-000890

Dear Judge Wood:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, assigned to represent defendant in the above-referenced action. Your Honor previously ordered that the parties provide the Court with proposed injunction language, or otherwise explain why the parties could not agree on injunction language, by November 12, 2014. See ECF dkt. entry no. 509.

As ordered by the Court, on October 31, 2014, defendant forwarded to plaintiffs proposed language for an injunction. Plaintiffs thereafter requested clarification of certain issues raised by defendant's proposal and suggested an alternate approach to the injunction. Defendant has sought from the New York State Education Department ("SED") additional information to aid in clarifying some of the issues raised by plaintiffs, and is also attempting to reformulate language for the proposed injunction.

To accomplish these goals, the parties jointly request an extension until November 21, 2014, submit to the Court proposed injunction language. The additional time will give the parties an opportunity to refine the proposed injunction language so that it may be acceptable to the parties.

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We appreciate the Court's attention to this matter.

Respectfully submitted,
/s/
William S.J. Fraenkel
Assistant Corporation Counsel

cc: All Counsel Via ECF

(Will M. Wood)